

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA**

ELIZABETH SINES et al.	:	Case No. 3:17-cv-00072
Plaintiff	:	Judge MOON
	:	
-v-		
JASON KESSLER et al.	:	
	:	
Defendants		

DECLARATION OF MATTHEW HEIMBACH

Mr. Matthew Heimbach, having been duly cautioned, declares and states as follows:

1. This declaration is based on personal knowledge.
2. I have been advised by my attorney that third party ESI vendors cost upwards of \$5,000 per device.
3. I cannot afford to pay for third party ESI vendor examinations of any electronic devices.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 24, 2018.

Matthew Heimbach

Signature: *Matt Heimbach*
Matt Heimbach (Oct 26, 2018)

Email: REDACTED